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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

RICHARD ZEITLIN, ADVANCED  
 TELEPHONY CONSULTANTS, MRZ  
 MANAGEMENT, LLC, DONOR  
 RELATIONS, LLC, TPFE, INC., AMERICAN  
 TECHNOLOGY SERVICES, COMPLIANCE  
 CONSULTANTS, CHROME BUILDERS  
 CONSTRUCTION, INC., and UNIFIED  
 DATA SERVICES,

Plaintiffs,

v.

BANK OF AMERICA, N.A., and JOHN and  
 JANE DOES 1-100,

Defendants.

Case No.: 2:18-cv-01919-RFB-BNW

**STIPULATION AND ORDER TO  
 EXTEND TIME TO FILE RESPONSE  
 TO AND REPLY IN SUPPORT OF  
 PLAINTIFFS' REFILED SECOND  
 MOTION TO COMPEL DISCOVERY  
 AND FOR SANCTIONS**

**(THIRD REQUEST)**

Pursuant to Local Rules IA 6-1, 7-1, and 7-2, Plaintiffs Richard Zeitlin; Advanced  
 Telephony Consultants; MRZ Management, LLC; Donor Relations, LLC; TPFE, Inc.; American  
 Technology Services; Compliance Consultants; Chrome Builders Construction, Inc.; and Unified  
 Data Services (the "Plaintiffs") and Defendant Bank of America, N.A. ("BANA"), by and  
 through their respective undersigned counsel of record, submit this Stipulation and Proposed  
 Order for a 10-day extension of BANA's deadline to file its response to Plaintiffs' Refiled Second  
 Motion to Compel Discovery and For Sanctions (ECF No. 195) (the "Motion"). The Motion was

1 filed on October 25, 2021, under seal, and is set for hearing on November 30, 2021. The Parties  
 2 request an extension from November 12, 2021, BANA's current deadline to respond, to  
 3 November 22, 2021. This is the Parties' third request for an extension of the briefing deadlines  
 4 for the Motion.

5 The Parties also request that the deadline for Plaintiffs to file a reply in support of their  
 6 Motion be extended to December 6, 2021. Plaintiffs' current deadline to file a reply is November  
 7 22, 2021. The Parties also request that the Court reschedule the November 30, 2021 hearing to  
 8 December 28, 2021, or another date after December 28, 2021 that is convenient for the Court.

9 This request for an extension is not intended to cause any delay or prejudice to any party.  
 10 The reason for the extension is to give the counsel time to evaluate and respond to the arguments  
 11 set forth in the Motion and BANA's response to the Motion in light of certain unavoidable and  
 12 largely unexpected personal scheduling conflicts, and to account for the intervening Thanksgiving  
 13 holiday.

14 IT IS HEREBY STIPULATED AND AGREED by and between the Parties that the time  
 15 for BANA to file their response to the Motion is extended to and through November 22, 2021 and  
 16 the time for Plaintiffs to file their reply in support of the Motion is extended to and through  
 17 December 6, 2021. The Parties also request that the Court reschedule the November 30, 2021  
 18 hearing to December 28, 2021, December 29, 2021, any date between January 4, 2022 to January  
 19 7, 2022, or another date after January 7, 2022 that is convenient for the Court and the Parties.

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### **Order**

23 IT IS ORDERED that ECF No. 199 is  
 24 GRANTED. IT IS FURTHER ORDERED that  
 25 the motion hearing set for 11/30/2021 is  
 26 RESCHEDULED to 1/6/2022 at 11:00 a.m.

27 IT IS SO ORDERED

28 DATED: 3:10 pm, November 04, 2021



BRENDA WEKSLER  
 UNITED STATES MAGISTRATE JUDGE

1 **IT IS SO STIPULATED.**

2 Dated: November 3, 2021

Dated: November 3, 2021

3 THE BERNHOFT LAW FIRM, S.C.

SNELL & WILMER L.L.P.

4 /s/ Daniel J. Treuden

/s/ Holly E. Cheong

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15 *Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on this date, I electronically filed the foregoing **STIPULATION AND ORDER TO EXTEND TIME TO FILE RESPONSE TO AND REPLY IN SUPPORT OF PLAINTIFFS' REFILED SECOND MOTION TO COMPEL DISCOVERY AND FOR SANCTIONS (THIRD REQUEST)** with the Clerk of the Court for the U. S. District Court, District of Nevada by using the Court's CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

DATED: November 3, 2021

/s/ Maricris Williams  
An Employee of Snell & Wilmer L.L.P.

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